

Section A. Verification Procedures for Factors of Eligibility								
Eligibility Factor	Self-Attestation Accepted without Additional Verification (Y/N)	Self-Attestation Accepted with Post-Eligibility Verification (Y/N)	Electronic Data Source Used (Y/N)	Reasonable Compatibility Standard Used	Specify Reasonable Compatibility Standard for Income	Ask for a Reasonable Explanation from the Individual (Y/N)	Paper Documentation Required from the Individual (Y/N)	Comments
Income*	NO	NO	YES	Both are above, at or below the applicable income standard. Other (Specify in Comments)	See Comments	YES	YES	If Both attestation and data are above, at, OR below the applicable income standard - reasonable compatability is met. If the attestation is above the applicable standard / data is below the applicable standard, then we would request additional information from the applicant. If the data is above the applicable standard / attestation is below the applicable standard,reasonable explanation and/or paper documentation will be requested. VT will verify Title II income with SSA through the HUB at application and resolve any inconsistencies post-enrollment. See A Additional Comments section for information related to VT's temporary income verification process.
Residency	YES	NO	NO	N/A	N/A	NO	NO	Accept Self Attestation unless there is a discrepancy with other information provided by the applicant or known to us through other programs. If an inconsistency is identified and affects eligibility, reasonable explanation and/or paper documentation may be requested.
Age (Date of Birth)	NO	NO	YES	N/A	N/A	YES	YES	If an inconsistency is identified and affects eligibility, reasonable explanation and/or paper documentation will be requested. If an inconsistency is identified, but does not affect eligibility, we will follow up with a request for a reasonable explanation and/or paper documentation, but will not hold up the eligibility process.
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	If this information cannot be confirmed by the HUB, we will check the application for typos, compare to other programs information, and last resort would be to have paper documentation and/or the applicant must resolve the issue with SSA.

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Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	Will confirm this through the HUB.If there are inconsistencies, the applicant has 90 days to resolve. It has been determined that the method the VT DMV uses to verify citizenship is in accordance with CFR 435.407. At this time Vermont does not intend to use the DMV data as there have been no connections made system wise. This may be implemented later as our new system is developed.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	Will confirm this through the HUB. If there are inconsistencies, the applicant has 90 days to resolve.
Household Composition	YES	NO	NO	N/A	N/A	NO	NO	If it appears that an individual reported on a new application is already being claimed as a member of another household, we will follow up to resolve the discrepancy.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	
Caretaker Relative	YES	NO	NO	N/A	N/A	NO	NO	If the child is active in another case/household we would need information documenting actual residence. If custody is in dispute we would ask for paper documentation, ie. School records, court documents.
Medicare	NO	NO	YES	N/A	N/A	YES	YES	We expect to get this information through the federal HUB.
Application for Other Benefits	YES	NO	NO	N/A	N/A	NO	NO	Looking at expanding the PARIS match to include other benefits, please see commentary in other sections regarding this.
Other: (Please describe any other eligibility factors in the space below)								

* States must check electronic data sources determined useful to verify income in accordance with 42 CFR 435.948 but can be done post-enrollment.
If the information obtained from electronic data sources and the information provided by or on behalf of the individual are both above, at or below the applicable income standard, the State must determine the applicant eligible or ineligible for Medicaid/CHIP. (NOTE: this option is prepopulated for the state and is not an option that can be changed).

** States must follow statute, regulations, and guidance for verification of SSN, citizenship and immigration status including obtaining such information through the federal data services hub if available.

*** States must accept self-attestation of pregnancy unless they have information that is not reasonably compatible with such attestation.

Section B1. Use of Electronic Data Sources

Financial:

Electronic Data Source	Determined Useful (Y/N) ¹	Accuracy Considered (Y/N)	Timeliness Considered (Y/N)	Ability to Access Considered (Y/N)	Age of Data Considered (Y/N)	Comprehensive Considered (Y/N)	Other Criteria Used (Y/N) (Please Describe in Comments section)	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Data Source Used for Post-Enrollment - Frequency Used (e.g. monthly, quarterly)	Comments
1. Internal Revenue Service (IRS)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		VT has determined that IRS data is not useful for determining Medicaid eligibility.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Utilizing the Hub for at application and renewal. We currently have a daily match through SSA that captures changes in social security income and new income. We intend to retain this match and replicate it in the new eligibility system to utilize post enrollment.
3. State Wage Information Collection Agency (SWICA)	NO	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	We intend to obtain quarterly wage information from the VT Dept of Labor, however, the data match will not be 10/1 ready. Current SWICA match is an existing match VT has between our old ACCESS system and the VT Department of Labor. This match is not planned to be integrated in new system until 2014 (exact date unknown).

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4. State Unemployment Compensation	NO	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	We currently run matches with VT Dept of Labor to verify unemployment compensation and to review when these benefits end. This data match will not be 10/1 ready. See additional comments.
5. State Administered Supplementary Payment Program	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		This is a match that we have in our existing eligibility program, ACCESS, and will be carried over to the new system. This will not be available 10/1/2013, but is scheduled to be moved over in late 2014.
6. State General Assistance Programs	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		GA programs do not verify information unless there is a conflict with existing data from other programs.
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		3Squares (SNAP) verifies wages with paystubs. Used strictly for wage data, as it's not MAGI calculated. This information would be used as long as the wages are no older than 3 months. We don't intend to do periodic data matching per se, however, when new income is reported for 3Squares it would trigger an update for health care.
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		Reach Up (TANF) verifies wages with paystubs. Used strictly for wage data, as it's not MAGI calculated. This information would be used as long as the wages are no older than 3 months. We don't intend to do periodic data matching per se, however, when new income is reported for Reach Up it would trigger an update for health care.
9. Office of Child Support Enforcement (OCSE)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		We believe we will be receiving most of the same data that OCS receives through our other data matches we have listed.

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10. State Income Tax	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		We believe this data source would duplicate data we would receive from the IRS. Also, access to this data would require an act of legislation.
11. Commercial database: (Pease describe any commercial databases in the space below)												
TALX/Work Number	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		The State of Vermont does not intend to use the TALX/Work Number October 1, 2013 as it is not in the current scope with our contractors. We are hoping to use this service through the HUB at some point in the future.
12. Other: (Please describe any additional electronic data sources in the space below)												

1. The state marked any criterion YES if they were considered in determining the usefulness of the electronic data source; however, the determination of whether the data source was useful/not useful did not rest solely on these criteria.

Section B2. Use of Electronic Data Sources

Non-Financial:

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
1. Social Security Administration (SSA)	YES	YES	YES	NO	NO	YES	NO	NO	NO	YES	NO	NO	YES	YES	YES	Other (specify in comments)	We will verify renewal and post enrollment for Medicare on an as needed basis (ie. Someone reports starting Medicare)
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	YES	Other (specify in comments)	Used at renewal or post enrollment to verify updates in status or 5yr bar is met.
3. Vital Statistics	YES	NO	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO		Secondary source for Citizenship and Age/DOB.
4. Department of Motor Vehicles (DMV)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		This will not be used used as a Secondary source for SSN and Citizenship for 10/1/13. At this time we do not have the means to have a connection between the DMV and ESD new system. This may be something that is implemented as our new system is further developed as it may help resolve inconsistencies prior to sending a verification notice. At this time we will follow up with the applicant if there are inconsistencies.

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
5. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO		Only used for SSN if verified with SSA first. Only used for citizenship if verified in accordance with Medicaid/CHIP rules. Data source can be utilized if inconsistency is identified with Residency in the course of other verifications
6. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO		Only used for SSN if verified with SSA first. Only used for citizenship if verified in accordance with Medicaid/CHIP rules. Data source can be utilized if inconsistency is identified with Residency in the course of other verifications
7. Office of Child Support Enforcement	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
8. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
9. Women, Infants and Children Program (WIC)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
11. Commercial database: <i>(Please describe any commercial databases in the space below)</i>																	

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
13. Other: (Please describe additional electronic data sources in the space provided below)																	
12. PARIS*	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Monthly	Utilized to check MA benefits in other states. Would like to expand to obtain information regarding benefits from other programs (Ie. VA, Railroad etc).
VT Dept of Corrections	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	Other (specify in comments)	It has been determined that we will obtain this information through the HUB. It has not yet been discussed whether the State would pursue further status data through a match with the VT Department of Corrections.
* Under 42 CFR 435.945(d), all State Medicaid eligibility systems must conduct a match with PARIS for Interstate benefit information. If used for other purposes, please indicate in Section D.																	

Section C . Additional Factors of Eligibility for Separate CHIP						
Eligibility Factor	Self- Attestation Accepted without Additional Verification	Self- Attestation Accepted with Post- Enrollment Verification	Electronic Data Source Used (Y/N) <i>If Yes, please describe in comments</i>	Paper Documentation Required from the Individual (Y/N)	Non- Applicable (N/A)	Comments
1. Applicant does not have other coverage	YES	NO	NO	NO	Must be Applied	CHIP follows Medicaid rules and procedures. If an inconsistency is identified through other means, paper documentation may be required.
2. Applicant does not have access to affordable ESI					N/A	
3. When child has had coverage (as applicable to states' waiting period)					N/A	
4. Access to public employee coverage					N/A	
5a. Waiting period exception #1 (describe):					N/A	
5b. Waiting period exception #2 (describe):					N/A	
5c. Waiting period exception #3 (describe):					N/A	
5d. Waiting period exception #4 (describe):					N/A	
5e. Waiting period exception #5 (describe):					N/A	
5f. Waiting period exception #6 (describe):					N/A	
5g. Waiting period exception #7 (describe):					N/A	
5h. Waiting period exception #8 (describe):					N/A	
5i. Waiting period exception #9 (describe):					N/A	
5j. Waiting period exception #10 (describe):					N/A	
6. Other eligibility factors or exceptions to eligibility factors: <i>(Please describe in the space provided below)</i>						

Section D. Additional Verification Questions

	Question	Response
1	If paper documentation is required when a data source is not available or the information obtained from a data source is not reasonably compatible with the information provided by or on behalf of the individual, briefly describe how the state determined that establishing and using an electronic data source was not effective, considering such factors as cost and program integrity in accordance with 42 CFR 435.952(c):	<p>State is accepting self-attestation without additional verification for multiple eligibility factors. For all other factors, states is utilizing multiple data sources, including using vital statistics as a secondary source for citizenship, prior to reaching out for reasonable explanation/paper documentation.</p> <p>For each data source, we considered the currency of the data, relevance, and availability. We also considered whether the electronic data source would produce an unreasonable number of false positives or false negatives. We considered and rejected data sources that we believed would require an unreasonable amount of staff time to match appropriately and address false incompatibilities.</p> <p>For income verification, we will temporarily be requesting paper documentation until completion of our systems build. See Additional Comments for further information.</p>
2	Please describe how the state uses PARIS?	Currently we use PARIS to verify duplicate benefits in multiple states. We hope to expand the match to verify other benefits. Please see comments in Section B2.
3	Please indicate (YES) or (NO) if the State intends to request Secretarial approval to solely use alternative data sources for financial verification other than those listed in 42 CFR 435.948 (Numbers 1-8 in Section B-1).	NO

	Question	Response
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ul style="list-style-type: none"> 1) Reduces administrative costs and burdens on both individuals and the State, 2) Maximizes accuracy and minimizes delay, 3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and 4) Promotes coordination with other insurance affordability programs. 	N/A
4	Please indicate (YES) or (NO) if the State intends to request Secretarial approval to use a mechanism other than the federal data services hub for information that is available through the hub.	NO
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ul style="list-style-type: none"> 1) Reduces administrative costs and burdens on both individuals and the State, 2) Maximizes accuracy and minimizes delay, 3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and 4) Promotes coordination with other insurance affordability programs. 	N/A
5	Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):	N/A

Section A. Additional Comments
Due to a delay in having a new eligibility system fully operational, VT is only able to collect income information from SSA (Title II) through the Hub. We currently do not have the capability to retrieve TALX data through the Hub or access any state/local current data sources, including SWICA, for current income information. As a result, VT must ask for paper documentation if SSA data does not provide adequate verification. We intend this to be a temporary process until the new system is fully functional. This is documented in the state's approved systems mitigation plan.
Section B1. Additional Comments
Section B2. Additional Comments
Section C. Additional Comments